

To: Federal Communications Commission

From: Randy Perkinson

Re: Comments regarding RM-10641

I recommend that this proposal be dismissed in its entirety for the following reasons:

- 1) It places a burden on retail point-of-sale establishments to maintain a written log of two-way radio sales to end users. Further, paragraph 2 of the proposal requires maintaining future information, which would be an extreme burden. The proposal does not require that the purchaser be licensed, merely that the record of the purchase be maintained.
- 2) A later paragraph requests that even equipment not requiring a license be covered as well. Many retail establishments may unknowingly sell a myriad of equipment in this category. Untrained and clerks would have a difficult time identifying this equipment.
- 3) A further burden is that the proposal requires the retailer to take action if suspicious activity is determined. This requires the retailer to become a policing authority.
- 4) A second portion of the proposal requires that certain equipment be tagged. I believe this requirement would hinder the resale of amateur equipment, which is often used for generations, or sold several times over its lifetime.

In summary, I believe the amateur radio community is a self-policing community. If this proposal is accepted in other areas. I suggest that amateur equipment be excepted.

Further, unlicensed equipment is that: unlicensed. There is no need to add recordkeeping to this class of equipment.

Finally, I do agree that GMRS equipment may be sold unwittingly to retail customers. It should be emphasized to these customers that a license is required for their operation, but ultimately, the FCC, not the retail marketplace, should enforce these regulations.